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Attorneys for Defendants

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

PEGGY PRUCHNICKI, and all similarly
situated individuals,

Plaintiff,

v.

ENVISION HEALTHCARE
CORPORATION d/b/a ENVISION
HEALTHCARE, EMCARE, INC., and
SHERIDAN HEALTHCORP, INC.,

Defendants.

Case No.: 2:19-cv-01193-JCM-BMW

**STIPULATION AND ORDER
EXTENDING TIME FOR
DEFENDANTS TO FILE THEIR REPLY
IN SUPPORT OF MOTION TO DISMISS
SECOND AMENDED COMPLAINT**

[First Request]

Pursuant to Local Rule IA 6-1, Defendants Envision Healthcare Corporation d/b/a Envision Healthcare (“Envision”), EmCare, Inc. (“EmCare”), and Sheridan Healthcorp, Inc. (“Sheridan”) (collectively, “Envision Defendants”) and Plaintiff Peggy Pruchnicki (“Plaintiff”), hereby stipulate and agree to, and respectfully request that the Court, extend the deadline for the

1 Envision Defendants to file their Reply in Support of their Motion to Dismiss Plaintiff's Second
2 Amended Complaint from September 30, 2019 to October 7, 2019. This is the Envision
3 Defendants' first request for an extension of this deadline.

4 1. On July 8, 2019, the Envision Defendants removed this action from the Eighth
5 Judicial District Court of Clark County Nevada to this Court. [ECF No. 1.]

6 2. On July 29, 2019, the Envision Defendants filed their Motion to Dismiss Plaintiff's
7 First Amended Complaint. [ECF No. 18.]

8 3. After meeting and conferring, the parties filed on August 21, 2019 a Stipulation to
9 allow Plaintiff to file her Second Amended Complaint. [ECF No. 22.]

10 4. On August 26, 2019, the Court granted the parties stipulation to allow Plaintiff to
11 file her Second Amended Complaint. [ECF No. 24.]

12 5. That same day, Plaintiff filed her Second Amended Complaint. [ECF No. 26.]

13 6. On September 9, 2019, the Envision Defendants filed their Motion to Dismiss
14 Plaintiff's Second Amended Complaint [ECF No. 27] and their Motion to Stay Discovery pending
15 resolution of their Motion Dismiss Plaintiff's Second Amended Complaint ("Motion to Stay")
16 [ECF No. 28].

17 7. On September 23, 2019, Plaintiff filed her Opposition to the Envision Defendants'
18 Motion to Dismiss Plaintiff's Second Amended Complaint [ECF No. 31] and her Opposition to
19 the Envision Defendants' Motion to Stay [ECF No. 32].

20 8. Currently, the Envision Defendants' Reply in support of their Motion to Dismiss
21 Plaintiff's Second Amended Complaint and their Reply in support of their Motion to Stay are due
22 on the same day, September 30, 2019.

23 9. To allow the Envision Defendants time to fully brief both Replies, the Envision
24 Defendants reached out to Plaintiff to request a seven-day extension of their deadline to file their
25 Reply in support of their Motion to Dismiss Plaintiff's Second Amended Complaint. With the
26 extension, the Envision Defendants' deadline to file their Reply in support of their Motion to
27 Dismiss Plaintiff's Second Amended Complaint would be October 7, 2019.

28 10. The Envision Defendants did not request and are not requesting an extension of

their deadline to file their Reply in support of their Motion to Stay.

11. Plaintiff agreed to the requested seven-day extension.

12. This request is for good cause and is not for the purposes of delay.

13. The Parties have not previously requested any extensions to the Envision Defendants' deadline to file their Reply in support of their Motion to Dismiss Plaintiff's Second Amended Complaint.

IT IS SO STIPULATED.

DATED this 24th day of September, 2019.

KNEPPER & CLARK LLC

By: /s/ Miles N. Clark

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DATED this 24th day of September, 2019.

BAKER & HOSTETLER LLP

By: /s/ Matthew D. Pearson

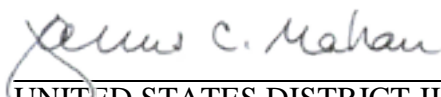
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Attorneys for Defendants

IT IS SO ORDERED:


UNITED STATES DISTRICT JUDGE

DATED: September 26, 2019